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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION

X CORP.,

Plaintiff,

v.

ROBERT A. BONTA, Attorney  
General of California, in his  
official capacity, and  
SHIRLEY N. WEBER, Secretary of  
State of California, in her  
official capacity,

Defendants.

Case No.

**NOTICE OF RELATED CASES**

NOTICE OF RELATED CASES

Pursuant to Local Rule 123, Plaintiff X Corp. hereby notifies the Court of the following related cases: *Kohls v. Bonta* and *The Babylon Bee, LLC v. Bonta*, consolidated at No. 24-cv-2527-JAM-CKD. See Order Consolidating Cases, No. 24-cv-2527-JAM-CKD, ECF No. 20 (E.D. Cal. Oct. 25, 2024). Plaintiff's case shares significant similarities with *Kohls* and *The Babylon Bee, LLC* such that assignment thereof to Judge John A. Mendez and Magistrate Judge Carolyn K. Delaney would likely affect a substantial savings of judicial effort and is also likely to be convenient for the parties.

First, this case involves the same Defendants as *Kohls* and *The Babylon Bee, LLC* – Robert A. Bonta and Shirley N. Weber.

Second, this case involves similar claims against the same California law, California Assembly Bill ("AB") 2655. Specifically, (i) as in *Kohls*, Plaintiff X Corp. alleges that AB 2655 violates the First and Fourteenth Amendments of the United States Constitution and Article I, Section 2, of the California Constitution – compare Complaint ¶¶ 96-113, 130-145, *X Corp. v. Bonta*, No. 24-cv-\_\_\_\_, ECF No. 1 (E.D. Cal. Nov. 14, 2024), with Complaint ¶¶ 109-144, 191-194, *Kohls*, No. 24-cv-2527-JAM-CKD, ECF No. 1 (E.D. Cal. Sept. 17, 2024); and (ii) as in *The Babylon Bee, LLC*, Plaintiff X Corp. alleges that AB 2655 violates the First and Fourteenth Amendments of the United States Constitution, compare Complaint ¶¶ 96-113, 130-145, *X Corp. v. Bonta*, No. 24-cv-\_\_\_\_, ECF No. 1 (E.D. Cal. Nov. 14, 2024), with Complaint ¶¶ 344-379,

1 *The Babylon Bee, LLC*, ECF No. 21 (E.D. Cal. Sept. 30, 2024).

2 Third, Judge John A. Mendez has already ruled on questions of  
3 law and fact that will significantly impact Plaintiff's X Corp.'s  
4 forthcoming Motion for Preliminary Injunction. *See Kohls v. Bonta*,  
5 2024 WL 4374134 (E.D. Cal. Oct. 2, 2024) (holding that AB 2839, a  
6 companion statute to AB 2655, that provides a cause of action  
7 against individuals who post "materially deceptive content" –  
8 defined nearly identically as it is in AB 2655 – likely violated  
9 the First Amendment on its face because the statute's "legitimate  
10 sweep pales in comparison to the substantial number of its  
11 applications . . . which are plainly unconstitutional").

12 X Corp. thus respectfully submits that its case is related  
13 within the meaning of the Local Rules to *Kohls v. Bonta* and *The*  
14 *Babylon Bee, LLC v. Bonta*, consolidated at No. 24-cv-2527-JAM-CKD.

1 Dated: November 14, 2024

2  
3 By: /s/ William R. Warne  
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